

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
**Lawrence, John P.**  
**Lawrence, Tamera E.**  
**Debtors/ Respondents** : 15-11899 SR

**Answer to Motion of  
For Relief from Automatic Stay**

Debtors, John P. and Tamera E. Lawrence, by and through their undersigned attorney, hereby provides the following answers to the Motion for Relief from Stay filed by Select Portfolio Servicing, Inc. for Deutsche Bank National et. al. These responses are made without prejudice to debtor's right to present additional facts or contentions at trial based upon information hereinafter obtained or evaluated. Debtors specifically reserves the right to supplement or amend their responses or present additional facts and contentions at a later date to any of the answers given.

1. Denied. The allegation contained herein are directed to a party other than the answering debtors, and they are denied as no response is required.

2. Admitted.

3. Admitted.

4.-5. Denied. The allegations are legal conclusions of law to which no answer is required.

6. Admitted.

7. -8. Denied The averments contained in these Paragraphs consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

9. Denied. Debtors can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded.

10. Denied. Strict proof is hereby demanded.

11.-13. Denied. The allegations are legal conclusions of law to which no answer is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtors pray that the motion be denied, and

such other relief as is just and proper. The Debtors specifically reserve the right to supplement the answer at or prior to the hearing thereon.

Dated: September 1, 2016

"/s/" Mitchell J. Prince  
John L. Mc Clain, Esquire  
Mitchell J. Prince, Esquire  
Attorneys for Debtors  
P.O. Box 123  
Narberth, PA 19072  
(215) 893-9357